



LEROY D. BACA, SHERIFF

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169



July 10, 2012

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012

Dear Supervisors:

**30-DAY STATUS OF RECOMMENDATIONS MADE IN THE OCTOBER 18, 2011,
BOARD OF SUPERVISORS' MEETING REGARDING THE MERRICK BOBB AND
OFFICE OF INDEPENDENT REVIEW REGARDING THE JAIL SYSTEM**

On October 18, 2011, your Board requested that the Los Angeles County Sheriff's Department (Department) report back on the motion to immediately implement the recommendations previously made by Special Counsel Merrick Bobb and the Office of Independent Review. In addition, your Board requested the Department report back on deputy worn video cameras, the status of the Department's hiring practices, sting audits, a force rollout team, and the length of time deputies serve in the jails. Attached is an update on each recommendation from the June 20, 2012, response.

Should you have any questions or require additional information, please contact me or Assistant Sheriff Cecil W. Rhambo, Jr., at (323) 526-5065.

Sincerely,

LEROY D. BACA
SHERIFF

A Tradition of Service

RECOMMENDATIONS BY MERRICK BOBB AND OFFICE OF INDEPENDENT REVIEW
REGARDING THE JAIL SYSTEM

COUNTY OF LOS ANGELES - SHERIFF'S DEPARTMENT

The purpose of this document is to provide a status of the recommendations by date and title, prepared by Special Counsel Merrick Bobb, the Office of Independent Review, and the Board of Supervisors.

- I. Install surveillance cameras at the Men's Central Jail, the Inmate Reception Center and the Twin Towers Correctional Facility within 30 days and develop a plan to purchase and install surveillance cameras at the remaining jail facilities.**

The Department has installed all 705 cameras at Men's Central Jail (MCJ). As of May 31, 2012, all cameras are online and recording.

The Department is installing cameras at Twin Towers Correctional Facility (TTCF) and the Inmate Reception Center (IRC). Currently, 615 cameras have been installed at TTCF (2 recording) and 49 cameras have been installed at IRC (19 recording).

The attached document (Camera Project Status Report) depicts the Department's current status on camera installation and the projected total of cameras.

Data Storage

The video storage servers provide storage of video data. They were received and installed in December 2011. With existing funds, additional memory has been added to provide long-term storage of video for 25 months at MCJ and TTCF. Technicians are analyzing equipment efficiency and quality of resolution as cameras are added to the servers. Several options regarding video storage are being considered in order to meet legal and Board approved requirements for video storage, while also maintaining quality resolution at a reasonable cost.

The network upgrade equipment are servers which send the video feed from the camera to the archive video server and was installed on April 28, 2012.

Policy

The Department has drafted a new policy regarding video surveillance. The policy is in the final stages of being reviewed by Department executives and County Counsel.

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II. Eliminate the use of heavy flashlights as batons to subdue inmates.

The Department and the Association for Los Angeles Deputy Sheriffs (ALADS) came to a mutual agreement regarding the use of flashlights in the jails. The Sheriff has directed and approved a new policy to limit the size and weight of the flashlight. The policy specifies that the flashlights shall not weigh more than 16 ounces, and shall not be more than 13 inches in length. Flashlights longer than 6 inches shall be of plastic or nylon composite material only. The Custody Division Manual (CDM) section 3-06/055.20 Flashlights, was published on May 23, 2012. The Department has not yet received the lightweight battery inserts to make the current duty issue flashlight in conformance with the new flashlight policy. This policy effective date will be extended to September 1, 2012, in order to allow employees a reasonable transition period to acquire a new duty light, or be issued a lightweight battery insert from the Department.

III. Eliminate the use of “steel-toe” shoes.

Recommendation implemented.

On October 24, 2011, the Department made revisions to the existing “Footwear” policy (MPP 3-03/225.00). This policy was published into the Department’s Manual of Policy and Procedures and disseminated to all personnel on February 12, 2012.

Research of existing personnel showed that Department personnel have never worn “steel toe” boots in any capacity; however, the Department formally revised the policy to strictly prohibit any use of “steel toe” boots.

IV. Revise the Policy on Head Strikes with Impact Weapons to forbid all head strikes, including, but not limited to, head strikes against fixed objects such as floors, walls or jail bars, unless the standard for lethal force has been met.

Recommendation implemented.

On October 10, 2011, the Sheriff initiated a “Force Prevention” policy (CDM 3-02/035.00) which provides direction for personnel relating to respect based treatment of incarcerated individuals. This policy was published into the Custody Division Manual and disseminated to all custody assigned personnel on November 8, 2011. The policy was then discussed with the ALADS working group in which revisions were made. The revised Force Prevention policy was republished and redistributed to all personnel in the jails on March 19, 2012.

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On October 26, 2011, the Department made additions to the existing "Unreasonable Force" (MPP 3-01/025.10) policy and the "Activation of Force/Shooting Response Teams" (MPP 5-09/434.05) to strictly prohibit head strikes against a hard object. Unless otherwise handled by the Internal Affairs Bureau (IAB), the Custody Force Response Team (CFRT) responds to all force incidents where any head strike occurs, whether the strike is initiated by personnel, or by contact with floors, walls or other hard objects. The "Unreasonable Force" and "Activation of Force/Shooting Response Teams" policies were published into the Department's Manual of Policy and Procedures and disseminated to all personnel on February 13, 2012.

V. Rotate jail deputies between floors at Men's Central Jail and other jail facilities at no less than six-month intervals.

Recommendation implemented.

In January 2011, Men's Central Jail began rotating their staff no less than every six months. After consulting with ALADS, a new Custody Directive "Mandatory Rotation of Line Personnel in Custody" (12-001) was published and disseminated to all custody personnel on February 17, 2012, mandating the rotation of all Custody line personnel every six months.

VI. Enforce the Anti-Retaliation Policy to prevent Sheriff's deputies from retaliating against inmates speaking with legal representatives or inmate advocacy groups or for expressing dissatisfaction with jail conditions.

Recommendation implemented.

In August 2011, the Department made revisions to the existing "Treatment of Inmates" (CDM 5-12/005.00) policy to prevent deputies from retaliating against inmates. All staff assigned to Custody Division were provided a formal briefing on the revisions to the policy. The briefing began August 4, 2011, and continued for a two-week period. In addition, the Department redistributed the policy on October 25, 2011, for another two-week recurring briefing to ensure each staff member was fully aware of the expectations of the policy and mandated quarterly recurring briefings be conducted.

The Department made additional revisions to the existing "Treatment of Inmates" policy in order to separate and create specific orders relating to retaliation against inmates. The Custody Division Manual, "Anti-Retaliation Policy" (CDM 5-12/005.05) mandates that all complaints of retaliation are forwarded to IAB; the captain of IAB will determine which unit will conduct the investigation. This

RECOMMENDATIONS BY MERRICK BOBB AND OFFICE OF INDEPENDENT REVIEW
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revised version of the "Treatment of Inmates" policy and the new "Anti-Retaliation Policy" were published and disseminated to all custody personnel on February 27, 2012.

- VII. Interviews of inmates who make claims of excessive force should not be conducted by, or in the presence of, the deputies or their supervising sergeant involved in the alleged use of force.**

Recommendation implemented.

On October, 26, 2011, the Department made revisions to the existing "Use of Force Reporting and Review Procedures" (MPP 5-09/430.00) policy ensuring privacy during force interviews. This policy was published in the Department's Manual of Policy and Procedures and disseminated to all personnel on February 13, 2012.

- VIII. Interviews of inmates alleging use of force and any witnesses must occur as soon as feasibly possible, but no later than 48 hours of the incident.**

Recommendation implemented.

On October, 26, 2011, the Department made revisions to the existing "Use of Force Reporting and Review Procedures" (MPP 5-09/430.00) policy directing supervisors to immediately conduct interviews. As noted in VII, this policy was published in the Department's Manual of Policy and Procedures and disseminated to all personnel on February 13, 2012.

- IX. Develop a prioritization process for Use of Force Investigations to ensure that the most severe incidents are completed within 30 days and that all others are completed within 60 to 90 days.**

Recommendation implemented.

The Department developed a CFRT Directive (11-005) that established new criteria for force review in the jails. This ensures that significant force cases, not handled by IAB, are externally evaluated and completed within 30 days. At that time, they are reviewed by the newly formed Custody Force Review Committee (CFRC), which consists of three commanders. The last CFRC was conducted on June 19, 2012, and included oversight by the Office of Independent Review (OIR). The next CFRC is scheduled for July 10, 2012.

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The Department continues to process the most severe incidents as IAB investigations, which are generally completed within 90 days unless unexpected circumstances arise.

The CFRT Directive was published and disseminated to all custody personnel on November 7, 2011. The aforementioned CFRT Directive was revised and published as a Custody Division Policy on May 23, 2012. The CFRC policy was published and disseminated to all custody personnel on April 16, 2012.

- X. Develop a plan for more intense supervision that requires jail sergeants to directly supervise jail deputies, including walking the row of jail cells and floors and responding as soon as possible to any notification of interaction where force is being used on an inmate.**

Recommendation Implemented at MCJ.

On October 27, 2011, the Department delivered a letter to the Chief Executive Officer requesting additional supervisory staff in the jails. However, the Department felt it was imperative to immediately increase staffing at MCJ.

Effective November 6, 2011, 19 sergeants were added to MCJ's current staffing to ensure the appropriate supervision was in place. These items were removed from other critical areas within the Department and deployed to cover both Day and PM shifts. There are now 2 sergeants assigned to 2000, 3000, 4000, 5000, and 9000 floors, and a full-time sergeant is dedicated to 1700/1750. All sergeants were briefed on the expectations to be visible and actively monitoring activity on the floor at all times. In addition, the Department is working on "duty statements" for all custody personnel to ensure they have a full understanding of the expectations of their assignment.

- XI. Immediately mandate that all custody medical personnel report all suspicious injuries of inmates to the Internal Affairs Bureau or the captain of the jail facility where the inmate is housed.**

Recommendation implemented.

On October 26, 2011, the Department's Medical Services Bureau revised the "Injury/Illness Report - Inmate" policy (M206.09) to include a provision requiring medical staff to advise the facility watch commander in the event an inmate reports/alleges that their injuries are the result of force used by a Department employee. This policy was disseminated to all medical personnel on October 26, 2011.

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XII. Report back on the role of the new jail commanders and how they will be used to reduce jail violence.

As reported to the Board on November 1, 2011.

Since the implementation of efforts by the CMTF to reduce jail violence and associated use of force incidents, total significant uses of force continue to decline. Two documents are attached relating to force incidents in the jails:

- Force Used by Month – Significant force vs. Less significant force*
- Force Year to Date – 2007 to 2012*

The jail commanders continue to work with each custody unit to accomplish the goals set forth by the Sheriff.

The jail commanders oversee the operations of the CMTF, comprised of five commanders, eight lieutenants, eight sergeants, and four support staff. The lieutenants, sergeants, and support staff are all items that were removed from critical units within the Department and deployed to this task force.

The CMTF Mission is to assess and transform the culture of the custody facilities in order to provide a safe, secure learning environment for our Department personnel and the inmates placed in the Department's care. The CMTF's purpose is to empower Department personnel to provide a level of professionalism and serve the needs of inmates consistent with the Department's "Core Values."

The CMTF's responsibilities and goals include promoting community trust, reducing jail violence by changing the deputy culture of the custody environment, encouraging respect based communications with inmates, reviewing and implementing new training for staff assigned to the jails, preparing and revising all directives/policies necessary to implement Special Counsel Merrick Bobb/OIR recommendations, analyzing force incidents and developing and implementing a custodial career path.

The CMTF and Custody Support Services have been working collaboratively to fulfill recommendation requests made by the American Civil Liberties Union (ACLU), Special Counsel Merrick Bobb, the OIR and the Los Angeles County Board of Supervisors, which pertain to the Jails (recommendations attached).

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Below is a summary of the current overall status of all recommendations made since 1994:

Agency	Implemented	Not Implemented	In Process	Totals Recommendations
ACLU	27	2	3	32
Bobb	94	8	17	119
OIR	75	2	8	85
BOS	6	0	2	8
Totals	202	12	30	244

The eight CMTF lieutenants work directly in accomplishing the goals set forth by the Sheriff and commanders. The eight CMTF sergeants are comprised as a jail force "roll-out" team (CFRT) who oversee, mentor and review all significant force cases that meet a particular criterion, yet do not rise to the level of an IAB investigation.

- XIII. Sheriff to work with the Chief Executive Office to immediately study the feasibility of purchasing officer worn video cameras for all custody personnel to use, to identify potential funding for this purpose, and develop appropriate policies and procedures for the use of these cameras. Policies should include a requirement that custody personnel record all interactions with inmates, including Title 15 checks, any movement throughout the jail facilities and any use of force. Each failure to record or immediately report any use of force against inmates must be appropriately disciplined.**

As reported to the Board on March 13, 2012.

The Department is conducting a six month "Proof of Concept" in order to determine whether there is a practical use for Personal Video Recording Devices (PVRD) in Custody Operations Divisions.

The Department has received and issued 30 PVRD's, for the pilot program. The CMTF drafted a guideline, and conducted training for the volunteer deputies involved in the program. The pilot program began on February 26, 2012, and will be re-evaluated in six months. The PVRD's are worn by deputies interacting with inmates at MCJ and TTCF. The Department has conducted testing with three different models of PVRD's.

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- XIV. Consider the feasibility of targeted and random undercover sting operations performed in custody facilities to ensure deputies are working within policy.**

As reported in closed session.

The Sheriff discussed this motion during the November 1, 2011, closed session meeting.

- XV. Consider a “roll-out team” to investigate when there is a use of force in a custody facility.**

Recommendation implemented.

Beginning November 2011, the Department created the CFRT, comprised of eight sergeants and a lieutenant, who are tasked with responding to selected custody facility force incidents.

The CMTF created a set criteria that mandate facility watch commanders to contact the CFRT and request a response. The CFRT sergeant will oversee and assist in the force documentation for the facility. In the course of reviewing the incident, the CFRT sergeant shall give specific direction to the handling supervisor. If any policy violations are discovered, the CFRT will immediately assume responsibility of the force investigation and initiate an IAB investigation.

All incidents requiring a CFRT response will be reviewed by a newly formed CFRC comprised of three commanders assigned to Custody Division. The CFRC has the authority to order additional investigation, make recommendations, or request an IAB investigation if there appears to be a possible violation of Department policy. Since the implementation of the CFRT, they have responded to 70 incidents as of July 2, 2012.

- XVI. Report back in 30 days on the hiring standards for deputy sheriffs and how they changed during the last hiring push.**

Recommendation completed - a full report on the hiring standards was provided in the November 1, 2011, letter.

- XVII. Consider a two-track career path for deputies, patrol deputies and custody deputies.**

Feasibility study is ongoing.

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On December 16, 2011, the CMTF concluded an extensive two-month study which analyzed different methods of implementing a two-track career path within the Department. Study results and CMTF recommendations have been presented to the Chief Executive Office (CEO), ALADS, PPOA, and the Public Safety Cluster Agenda Review meeting on February 8, 2012.

The Department formed a subject matter expert working group to update the current sergeant and lieutenant classifications for the Dual Track Career Path proposal, and is also working with the CEOs Classification Unit regarding its implementation. The CMTF continues to conduct informational meetings concerning the proposal with the Chief Executive Office (CEO), ALADS, and PPOA.

XVIII. Review existing policy of assigning new deputies to custody functions, specifically, the length of time spent in custody and the hiring trend as its primary determining factor, and revise the policy to reduce the length of time deputies serve in custody.

On October 28, 2011, the Department authorized custody personnel to initiate extensions if they desire to remain in their current assignment. As of July 5, 2012, 406 deputies have taken advantage of this offer, which will ultimately cause a reduction of time that deputies will serve in a custody assignment.

As noted in the above item, recommendations for a two-track career path were presented to the CEO, ALADS, Professional Peace Officers Association, and the Public Safety CARs meeting on February 8, 2012, which will reduce the length of time deputies, serve in custody.

CAMERA PROJECT STATUS REPORT

6/18/2012

MCJ

MEN CENTRAL JAIL	CAMERAS REQUIRED	INSTALLED	NEEDED
1750 FLOOR	42	42	0
2000 FLOOR	139	139	0
3000 FLOOR	146	146	0
4000 FLOOR	97	97	0
5000 FLOOR	42	42	0
9000 FLOOR	24	24	0
6000 FLOOR	25	25	0
7000 FLOOR	23	23	0
8000 FLOOR	29	29	0
PAROLE	36	36	0
OLD IRC	24	24	0
BASEMENT/KITCHEN	55	55	0
VISITING	23	23	0
TOTAL:	705	705	0

TTCF

	CAMERAS REQUIRED	INSTALLED	NEEDED
TOWER 1			
LEVEL 1	47	0	47
LEVEL 2	36	0	36
LEVEL 3	58	58	0
LEVEL 4	58	58	0
LEVEL 5	58	58	0
LEVEL 6	58	58	0
LEVEL 7	56	56	0
TOWER 2			0
LEVEL 1	38	0	38
LEVEL 2	37	31	6
LEVEL 3	64	64	0
LEVEL 4	58	58	0
LEVEL 5	58	58	0
LEVEL 6	58	58	0
LEVEL 7	58	58	0
IRC			
LEVEL 1	47	17	30
LEVEL 2	45	32	13
TOTAL:	834	664	170



LOS ANGELES COUNTY SHERIFF'S DEPARTMENT **FORCE USED BY MONTH SIGNIFICANT VS LESS SIGNIFICANT**

2011

CUSTODY DIVISION	January 2011			February 2011			March 2011			April 2011			May 2011			June 2011		
	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total
CRDF	6	2	8	8	5	13	4	4	8	2	2	4	5	2	7	10	1	11
CST	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EAST FACILITY	2	3	5	4	0	4	0	0	0	0	0	0	0	1	1	0	1	1
IRC	9	3	12	9	1	10	12	1	13	10	0	10	8	6	14	8	2	10
MEN'S CENTRAL JAIL	16	1	17	19	1	20	11	1	12	9	2	11	17	5	22	10	3	13
MIRA LOMA FACILITY	0	0	0	0	2	2	1	0	1	0	0	0	0	0	0	0	0	0
NCCF	6	6	12	1	3	4	5	2	7	2	1	3	2	3	5	7	4	11
NORTH FACILITY			0			0			0			0			0			0
SOUTH FACILITY	0	1	1	0	0	0	2	0	2	1	0	1	2	0	2	0	0	0
TWIN TOWERS	5	2	7	3	1	9	3	2	5	7	1	8	9	0	9	6	2	8
	44	18	62	49	13	62	38	10	48	31	6	37	43	17	60	41	18	54

CUSTODY DIVISION	July 2011			August 2011			September 2011			October 2011			November 2011			December 2011		
	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total
CRDF	7	2	9	6	2	8	6	1	7	3	1	4	4	4	8	2	4	6
CST	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	2
EAST FACILITY	0	1	1	1	0	1	3	2	5	0	0	0	0	3	3	1	0	1
IRC	6	2	8	5	1	6	12	4	16	1	4	5	2	2	4	2	0	2
MEN'S CENTRAL JAIL	17	3	20	17	0	17	10	2	12	4	5	9	6	6	12	3	4	7
MIRA LOMA FACILITY	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NCCF	5	3	8	5	1	6	2	3	5	4	1	5	3	3	6	1	4	5
NORTH FACILITY			0			0			0			0			0	0	0	0
SOUTH FACILITY	2	0	2	0	0	0	2	0	2	1	0	1	1	1	2	0	0	0
TWIN TOWERS	7	1	8	5	1	6	4	4	8	7	4	11	3	5	8	4	3	7
	44	12	56	39	5	44	39	16	55	20	15	35	19	24	43	16	16	30

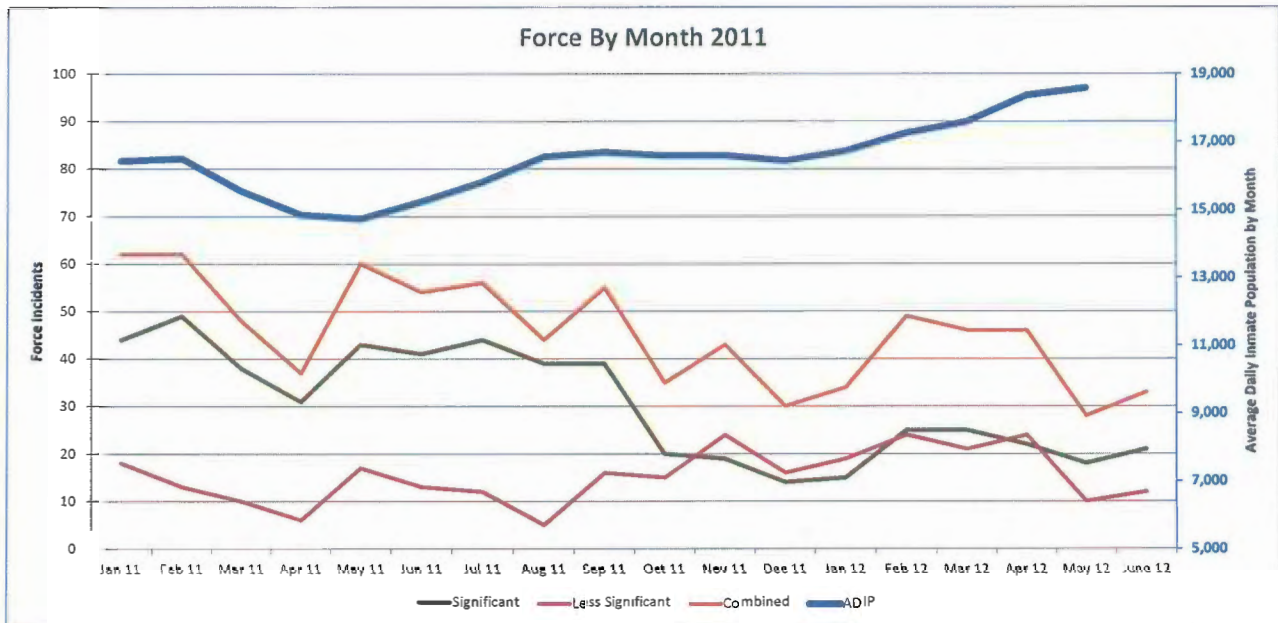
2012

CUSTODY DIVISION	January 2012			February 2012			March 2012			April 2012			May 2012			June 2012		
	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total
CRDF	2	6	8	1	3	4	1	2	3	2	6	8	2		2	1	1	2
CST	0	0	0	3		3	1	1	2	1	1	2		1	1			0
EAST FACILITY	1	2	3	1	1	2	1	1	2	1		1	3	1	4		1	1
IRC	1	3	4	2	4	6	1	8	9	3	4	7	1	1	2	2	2	4
MEN'S CENTRAL JAIL	7	3	10	14	6	20	5	4	9	8	4	12	5	2	7	7	3	10
MIRA LOMA FACILITY	0	0	0			0			0			0			0	1		1
NCCF	1	4	5	2	2	4	6	1	7	2	3	5	3	3	6	5	2	7
NORTH FACILITY	0	0	0			0			0			0			0			0
SOUTH FACILITY	1	0	1		2	2	2		2			0	1	1	2			0
TWIN TOWERS	2	1	3	2	6	8	8	4	12	5	6	11	3	1	4	5	3	8
	15	19	34	25	24	49	25	21	46	22	24	46	18	10	28	21	12	33

CUSTODY DIVISION	July 2012			August 2012			September 2012			October 2012			November 2012			December 2012		
	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total
CRDF			0			0			0			0			0			0
CST			0			0			0			0			0			0
EAST FACILITY			0			0			0			0			0			0
IRC			0			0			0			0			0			0
MEN'S CENTRAL JAIL			0			0			0			0			0			0
MIRA LOMA FACILITY			0			0			0			0			0			0
NCCF			0			0			0			0			0			0
NORTH FACILITY			0			0			0			0			0			0
SOUTH FACILITY			0			0			0			0			0			0
TWIN TOWERS			0			0			0			0			0			0
	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

CUSTODY DIVISION	2011 Totals			2012 Totals		
	Sig Force	Less Sig Force	Total	Sig Force	Less Sig Force	Total
CRDF	63	30	93	9	18	27
CST	1	1	2	5	3	8
EAST FACILITY	11	11	22	7	6	13
IRC	84	26	110	10	22	32
MEN'S CENTRAL JAIL	139	33	172	46	22	68
MIRA LOMA FACILITY	1	2	3	1	0	1
NCCF	43	34	77	19	15	34
NORTH FACILITY	0	0	0	0	0	0
SOUTH FACILITY	11	2	13	4	3	7
TWIN TOWERS	68	26	94	25	21	46
	421	183	604	126	110	236

*Totals presented are as of 07/05/2012



Reportable force is less significant when it is limited to any of the following and there is no injury or complaint of pain nor any indication of misconduct:

- Searching and handcuffing techniques resisted by the suspect,
- Department-approved control holds, come-along, or take down,
- Use of Oleoresin Capsicum spray, Freeze +P or Deep Freeze aerosols, or Oleoresin Capsicum powder from a Pepperball projectile when the suspect is not struck by a Pepperball projectile.

Reportable force is significant when it involves any of the following:

- Suspect injury resulting from use of force,
- Complaint of pain or injury resulting from use of force,
- Indication or allegation of misconduct in the application of force,
- Any application of force that is greater than a Department-approved control hold, come-along, or take down. This includes the activation of the electronic immobilization belt or the use of the Total Appendage Restraint Procedure (TARP).

*Totals presented are as of 07/05/2012



LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

FORCE USED YTD 2007-2012



	2007	2008	2009	2010	2011	2012
Month	Total Incidents	Total Incidents	Total Incidents	Total Incidents	Total Incidents	Total Incidents
Jan	96	110	98	49	62	34
Feb	84	76	83	51	52	49
Mar	100	77	90	81	48	46
Apr	75	69	80	71	37	46
May	101	79	85	70	60	28
Jun	91	85	93	71	54	33
Jul	82	77	84	63	56	
Aug	98	96	114	67	44	
Sep	89	94	80	56	55	
Oct	105	73	89	52	35	
Nov	94	78	75	52	43	
Dec	99	66	85	58	30	
Grand Total	1114	980	1056	741	588	236
Percentage Difference		-12.03%	7.76%	-29.83%	-20.92%	-26.93%
2012 Numbers reflect the difference between the same time span from 2011.						

*Totals presented are as of 06/30/2012